

Additional Comments RE: MM Docket No. 99-25 (Creation of a Low Power Radio Service)

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These comments are in addition to my comments transmitted February 9 as a potential community broadcaster.

As for the electronic filing period, it would make sense for each level of LPFM service to have a separate filing period with LP1000 stations considered first, followed by LP100 stations. This would maximize creation of stations with greater potential for service and success, and provide the bureau with a sensible prioritization for handling applications.

The potential for a flood of microstation applications could slow processing considerably, and should be considered last. Also, there doesn't seem to be much merit in considering stations with less than 10 watts, however, such facilities could serve some schools and other groups with smaller service requirements.

I have some reservations about microstations in that authorization of a very low-powered service may be perceived somehow as licensing or accepting pirates. If this service is authorized, it should be at 10 watts and be subject to the same service rules applied to LP100 stations.

All LPFM stations should offer full interference protection to existing stations as proposed, however, they could receive interference in about 10 percent of their 60 db contour. This is a reasonable compromise that would permit the licensing of more stations. In some cases, the received interference is only theoretical. For example, in a frequency for an LP100 I'm interested in applying for, there is no perceptible interference within the proposed service area using receivers with digital tuning even though spacing from a co-channel broadcaster would indicate interference at the fringe.

Given improvements in modulation technology, I believe transmitters with built-in modulation limits would negate the need for separate, expensive modulation monitors.

Cordially,

Walter Molony